

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

-v.-

ARTHUR GIANELLI,
JOSEPH YERARDI, JR.,
DENNIS ALBERTELLI A/K/A "FISH,"
SALVATORE RAMASCI A/K/A "LEFTY,"
RANDY ALBERTELLI,
GISELE ALBERTELLI,
RAFIA FEGHI A/K/A RAFIA YERARDI,
FRANK IACABONI,

Defendants.

Criminal No. 05-10003-NMG

ASSENTED TO MOTION FOR EXTENSION OF TIME AND EXCLUDABLE DELAY

Pursuant to Local Rules 112.2(B) and 116.5, and pursuant to 18 U.S.C. §§ 3161(h)(1)(F) and 3161(h)(8)(A), the government, with the assent of the defendants, hereby moves (1) for extensions of time for (a) the defendants to submit their joint discovery letter, (b) the government to submit its response, and (c) the next status conference; and (2) for a corresponding period of excludable delay, in the above-captioned case.

In support of this assented-to motion, the government states that based upon matters discussed at the previous status conference in this case on June 27, 2006, and subsequent developments, the parties agree that it would be appropriate to change the due dates for the defendants' joint discovery letter, the government's response, and the date of the next status conference, and that a corresponding Speedy Trial Act exclusion should be entered. We believe that such extensions would avoid wasteful duplication of effort by the parties and the court.

Accordingly, it is hereby requested that the defendants' joint discovery letter be due on or about September 20, 2006; that the government's response be due on or about October 11, 2006; and

that the next status conference occur on or about October 4, 2006. It is further hereby requested that the Court enter a Speedy Trial Act period of excludable delay through the last of the rescheduled dates (i.e., on or about October 11, 2006).

The undersigned Assistant United States Attorney has discussed this matter with Charles W. Rankin, Esq., who stated that he has conferred with the other defense counsel in this case, and that they all assent to this motion.

The requested extensions of time and period of excludable delay is likely to conserve judicial resources and to be in the interests of parties and of the public. Thus, the requested extensions of time and period of excludable delay would best serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial.

The defendants assent to this motion as set forth above.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ MICHAEL L. TABAK
MICHAEL L. TABAK
Assistant United States Attorney
U.S. Attorney's Office
United States Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02210
617-748-3203

CERTIFICATE OF SERVICE

This is to certify that I have this day served upon the persons listed below a copy of the foregoing document by depositing in the United States mail a copy of same in an envelope bearing sufficient postage for delivery:

Richard M. Egbert, Esq.
Law Office of Richard M. Egbert
99 Summer Street, Suite 1800
Boston, MA 02110
Counsel for Arthur Gianelli

Raymond A. O'Hara, Esq.
1 Exchange Place
Worcester, MA 01608
Counsel for Randy Albertelli

Francis J. DiMento, Esq.
DiMento & Sullivan
7 Faneuil Hall Marketplace
Boston, MA 02109-1649
Counsel for Joseph Yerardi, Jr.

Page Kelley, Esq.
Federal Defenders
408 Atlantic Avenue
Boston, MA 02210
Counsel for Gisele Albertelli

Charles W. Rankin, Esq.
Rankin & Sultan
151 Merrimac Street, Second Floor
Boston, MA 02114-4717
Counsel for Dennis Albertelli

Walter B. Prince, Esq. and Paige A. Scott Reed, Esq.
Prince, Lobel Glovsky & Tye, LLP
585 Commercial Street
Boston, MA 02109
Counsel for Rafia Feghi

Joseph J. Balliro, Sr., Esq.
Balliro & Mondano
99 Summer Street, Suite 1800
Boston, MA 02110
Counsel for Salvatore Ramasci

Thomas J. Butters, Esq. and John H. Brazilian, Esq.
Butters Brazilian LLP
One Exeter Plaza
Boston, MA 02116
Counsel for Frank Iacaboni

This 11th day of August, 2006.

/s/ SHAUNA NEUHAUSER

Shauna Neuhauser
Legal Assistant